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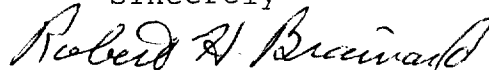
Attn: Frequency Control Group

The radio control modelers work very hard to control the use of thier allotted frequencys, 72 MHz snd 75 MHz, at any part-icular time in order to minimize any accidents from occuring due to frequency infringement that could create physical and financial hazards.

I understand that the increaing demands being placed on your organization by the public for additional radio control frequencies is a problem, but implementation of NPRM - PR Docket 92-235 in the area of Part 95 will definately undermine the effort being put forth by the modeling community and will create unneeded problems.

Please do what you can to prevent this situation occuring.

Sincerely



Robert H. Brainard (Retired)
AMA # 412048

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SPECIAL DELIVERY

APCO ISSUES STATEMENT - FCC DOCKET 92-235

I. SUMMARY

Public Safety Priority

Public safety communications priority ranks second only to national defense, as established both by statute and by court decision. APCO is concerned that the FCC's proposals in this proceeding are inconsistent with this statutory priority.

Specifically, refarming proposed for the 150-174 MHz band reduces public safety block allocation bandwidth by .71 MHz, or by 23% of our current allocation. While the proposal would give public safety 464 "channels," the proposed 5 kHz bandwidth will not, in the foreseeable future, be capable of providing the quality of communications, and the features required, as discussed later.

In Docket 84-232, the FCC projected public safety spectrum requirements to the year 2000. In responding to the recent NTIA spectrum inquiry, APCO determined, using FCC formulas, that public safety spectrum use was 70% above that projected by Docket 84-232 for September, 1992. [See Appendix A]

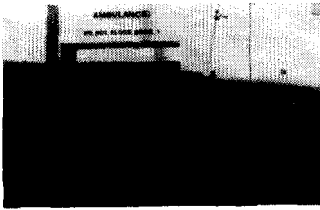
Section 88.429 proposes reduced transmitter output power that will cripple or destroy many existing systems, requiring the outlay of millions of dollars in public funds to add additional transmitters and sites to provide the same coverage and also requiring additional spectrum to link many of these new sites together. In many cases, the individual agencies will opt for additional frequencies to provide required coverage to avoid the expense of installing simulcast systems, thus requiring two or more times the initial number of channels.

Section 88.231 appears to prohibit mobile relay operation in 150-174 MHz band for the Public Safety Service. Thousands of public safety systems (city, county, regional and state) now use mobile relays in this band. New allocations developed from splitting of current public safety channels in the 150-174 MHz band should be paired and assigned for exclusive public safety use.

The assignment of 5 kHz channels in the 150-174 MHz band appears to require equipment which will make state/local government incompatible with recently adopted 6.25 kHz federal government standards in the same band using the same equipment at reasonable cost. Local/state/federal interoperability, a major concern at all levels of government, will be lost.

Docket 92-235 envisions both state/local government and commercial users in the United States using the small "cellular" type of systems used in Europe. The major shortfalls of the "cellular" approach are what has caused active British participation in APCO

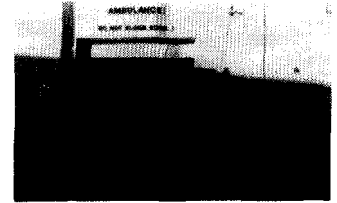
Project 25 and a detailed inspection by their Home Office of larger coverage systems in the United States. Small, low powered systems have specific applications, but do not fill the wide area (state, regional, county) requirements of many of today's public safety and commercial systems.



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Phone (503) 573-2320

January 19, 1993

Dear Sirs:

I would like to go on record as opposing docket #92-235. It has not adequately addressed the special needs of the field of public safety organizations. Please see the attached APCO ISSUES STATEMENT in regards to docket #92-235.

Thank you for your attention to this matter.

Don Geisler
Director or EMS

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JAN 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

cc: James DeRosier
Robert Packwood
Mark Hatfield
Robert Smith

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